

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JOSEPH THOMAS, et al,**

**Plaintiffs**

**vs.**

**Civil Action No. 3:18cv441-CWR-FKB**

**PHIL BRYANT, Governor of  
Mississippi, et al.,**

**Defendants.**

**DECLARATION OF MAXWELL PALMER, Ph.D.**

1. My name is Maxwell Palmer. I testified as an expert for the Plaintiffs in this case.

2. I have examined the remedial plan adopted by the Mississippi Legislature. The new plan shifts the five Bolivar County precincts previously in District 22 to District 13, and shifts three Sunflower County precincts from 13 to 22. Collectively, the five Bolivar County precincts are heavily white and the three Sunflower County precincts are heavily African-American. I have also examined the remedial plan adopted by the Court. As documented by Mr. Cooper, it shifts Issaquena County and eight Warren County precincts from District 23 to 22, and shifts the Madison County precincts in District 22, as well as eight Yazoo County precincts, from 22 to 23. I have analyzed the election results within the revised District 22 in both plans for the 2015 statewide general elections involving African-American candidates running against white candidates. In both plans, there is extensive racially polarized voting in revised District 22 just as there was in the existing District 22.

3. Within this context of racially polarized voting, the increase in the District 22 African-American age population percentage from 50.8% in the existing plan to 58.1% in the

legislative plan and to 62.1% in the court ordered plan significantly increases the potential of African-American voters to elect candidates of their choice.

# # #

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on April 3, 2019.

Maxwell Palmer  
Maxwell Palmer, Ph.D.